



FEDERAL ELECTION COMMISSION  
Washington, DC 20463

**MEMORANDUM**

**TO:** The Commission

**FROM:** Lisa J. Stevenson  
Acting General Counsel

Kathleen Guith  
Associate General Counsel for Enforcement

**BY:** Stephen A. Gura *SG*  
Deputy Associate General Counsel for Enforcement

Mark Shonkwiler *MS*  
Assistant General Counsel

**SUBJECT:** MUR 7227 (Southwest Carpenters Vacation Trust, *et al.*)  
Pre-Probable Cause Conciliation Agreement

On March 21, 2017, the Commission found reason to believe that Carpenters Legislative Improvement Committee United Brotherhood of Carpenters and Joiners, and Andris Silins in his official capacity as treasurer ("CLIC"), and Southwest Regional Council of Carpenters Legislative Improvement Committee United Brotherhood of Carpenters & Joiners of America, and Randy Thornhill in his official capacity as treasurer ("SW-CLIC"), violated 52 U.S.C. §§ 30104(b), 30116(f), and that the Southwest Carpenters Vacation Trust ("Trust") violated 52 U.S.C. § 30116(a)(1)(C). These findings relate to funds mistakenly withheld from union carpenters' vacation pay and transferred from the Trust to CLIC and SW-CLIC due to a software programming error. The Commission also authorized the Office of General Counsel to engage in pre-probable cause conciliation with the Committee. Attached is a negotiated conciliation agreement. Attach 1. We recommend that the Commission accept this agreement and close the file in this matter.

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17 We believe this negotiated settlement represents an acceptable resolution of this matter.  
18 We therefore recommend that the Commission accept the attached signed conciliation agreement  
19 and close the file.  
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21 **RECOMMENDATIONS:**

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23 1. Accept the attached conciliation agreement.  
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25 2. Approve the appropriate letter.  
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27 3. Close the file.  
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<sup>1</sup> CSAC stands for "Carpenters Southwest Administrative Corporation," and it is the entity that was established to administer the Trust. [This explanatory footnote does not appear in the Conciliation Agreement.]